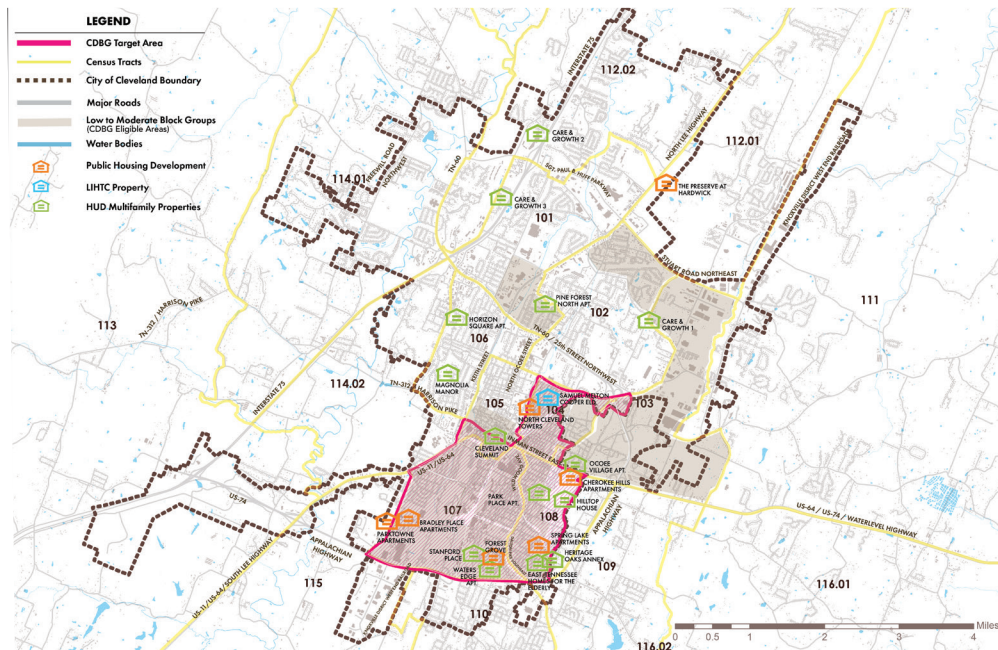


CITY OF CLEVELAND, TN

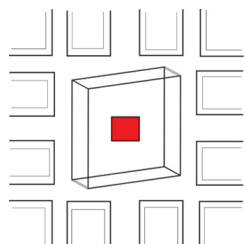
ANALYSIS OF IMPEDIMENTS STUDY TO FAIR HOUSING CHOICE MAY 2019



CITY OF CLEVELAND, TN
CDBG ENTITLEMENT PROGRAM
POST OFFICE BOX 1519
CLEVELAND, TENNESSEE 37364

MAY 10, 2019

Prepared by:



FARMER | MORGAN

PLANNING DESIGN CONSTRUCTION

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City of Cleveland

CLEVELAND, TENNESSEE
Office of the Mayor

Kevin Brooks
Mayor



Cleveland Municipal Building
190 Church Street, N.E.
P.O. Box 1519
(423) 476-8931
(423) 559-3364 Fax

May 14, 2019

Ms. Mary C. Wilson, Director
Office of Community Planning & Development
U.S. Dept. of Housing & Urban Development
Knoxville Field Office, Region IV
John J. Duncan Federal Building
710 Locust Street, Suite 300
Knoxville, TN 37902-2526

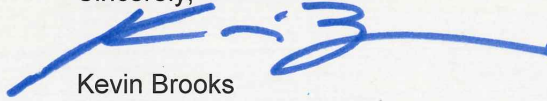
**RE: City of Cleveland, Tennessee
Consolidated Plan 2018-2023 and Annual Action Plan 2019, Analysis of
Impediments to Fair Housing Choice**

Dear Ms. Wilson:

The City of Cleveland is pleased submit the City of Cleveland's Consolidated Plan 2019-2023 and Annual Action Plan 2019. Also, attached find the resolution approving the Consolidated Plan, Annual Action Plan and the Analysis of Impediments to Fair Housing Choice. Forms SF-424 and the required certifications are in the front of the document.

If you need further information, please feel free to contact Ms. Cathy Andrews at (423) 457-9562 or candrews@clevelandtn.gov.

Sincerely,


Kevin Brooks
Mayor



RESOLUTION NO: 2019-41

**RESOLUTION FOR APPROVAL OF THE 2019-2023 CONSOLIDATED PLAN/
2019 ANNUAL ACTION PLAN
AND
ANALYSIS OF IMPEDIMENTS STUDY TO FAIR HOUSING CHOICE
FOR THE COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG)
PROGRAM**

WHEREAS, the City Council of the City of Cleveland, Tennessee is approving the *City of Cleveland 2019-2023 Consolidated Plan/ 2019 Annual Action Plan* and *Analysis of Impediments Study to Fair Housing Choice*; and

WHEREAS, the aforementioned *2019-2023 Consolidated Plan/2019 Action Plan* and *Analysis of Impediments Study to Fair Housing Choice* was the subject of public hearings on September 24, 2018, February 19, 2019, March 14, 2019 and again on March 19, 2019. A draft of the *Consolidated Plan/Action Plan* and *Analysis of Impediments Study to Fair Housing Choice* was available on April 9, 2019 which began a thirty-day comment period ending on May 9, 2019 with copies of the Plans being made available at the Development and Engineering Services Office, the Cleveland Public Library, and on the City's website www.clevelandtn.gov as advertised in the *Cleveland Daily Banner* on April 9, 2019;

WHEREAS, comments concerning the aforementioned Action Plan were received by City staff and reported to the City of Cleveland and the City of Cleveland has considered the comments:

NOW, THEREFORE, BE IT RESOLVED, the *2019-2023 Consolidated Plan/2019 Action Plan* and *Analysis of Impediments Study to Fair Housing Choice* be approved by the City Council, and be it further resolved that City staff are authorized to submit the aforementioned Plans to the United States Department of Housing and Urban Development (HUD), and be it resolved that the Mayor is authorized to sign all grant agreements, contracts and certifications with HUD that are required to carry out the CDBG program described in the Action Plan.

Approved 13th day of May, 2019.

Approved as to form:



John Kimball, City Attorney



Kevin Brooks, Mayor



Shawn McKay, City Clerk

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CITY OF CLEVELAND, TENNESSEE
ANALYSIS OF IMPEDIMENTS STUDY TO
FAIR HOUSING CHOICE

INTRODUCTION & EXECUTIVE SUMMARY OF THE ANALYSIS





A) INTRODUCTION AND EXECUTIVE SUMMARY OF THE ANALYSIS

The Analysis of Impediments Study to Fair Housing Choice (AI) provides cities with information related to policies, procedures, and practices in place that impede fair housing choice for all its citizens. The study is a requirement by the U.S. Department of Housing and Urban Development (HUD) to ensure that its entitlement jurisdictions are affirmatively furthering fair housing choice through its federally funded programs and projects. The City of Cleveland became a HUD entitlement jurisdiction in 2004 with its first allocation of Community Development Block Grant (CDBG) funds. Since then, the city has planned and provided activities to accomplish this requirement through public awareness efforts, promoting April as Fair Housing Month (April), and participated in regional fair housing activities.

The basis for this requirement is embedded in the Federal Fair Housing Act as of the Civil Rights Act of 1968, as defined below.

The Federal Fair Housing Act (FHAct). 42 U.S.C. 3601-19, prohibits discrimination in housing practices on the basis of race, color, religion, sex, national origin, familial status, and disability. (FH Act uses the term handicap. however, this document uses the term disability, which has the same legal meaning.) The Act prohibits housing providers from discriminating against persons because of their disability or the disability of anyone associated with them and from treating persons with disabilities less favorably than others because of the disability. The Act also requires housing providers to make reasonable accommodations in rules, policies, practices, or services, when such accommodations may be necessary to afford such person(s) equal opportunity to use and enjoy a dwelling. In addition, the Act requires that housing providers allow tenants to make reasonable modifications to units and common spaces in a dwelling. The Act applies to the vast majority of privately and publicly owned housing including housing subsidized by the federal government or rented through the use of Section 8 voucher assistance. HUD's regulations implementing the disability discrimination prohibitions of the Act may be found at 24 CFR 100.201-205.

Furthermore, the impediments to fair housing choice are:

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices
- Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status, or national origin.

The AI is a review of **impediments to fair housing choice** in the public and private sector. The study involves:

- A comprehensive review of a State or Entitlement jurisdiction's laws, regulations, and administrative policies, procedures, and practices



- An assessment of how those laws, etc. affect the location, availability, and accessibility of housing
- An assessment of conditions, both public and private, affecting fair housing choice for all protected classes
- An assessment of the availability of affordable, accessible housing in a range of unit sizes.

The AI process was combined with the Consolidated Planning process and began in February 2019 with a series of meetings with various city department directors and partners within the city of Cleveland, TN. A questionnaire was also disseminated to obtain feedback regarding fair housing choice and barriers to affordable housing. Two public hearings were also held to disseminate information, gather and obtain valuable community input, and obtain useful information for the Consolidated Plan and AI study. A list of participants is included in the Appendix of the Consolidated Plan.

The following is a list of impediments to fair housing choice in Cleveland. The list of impediments and recommendations are found in the last section of this study and is not conclusive but provides the city with useful strategies for implementation.

1. Limited housing stock and homogeneity in housing units.
2. Lack of public awareness of fair housing laws and landlord-tenant laws. Use of complex and legal language prevents common people from understanding it.
3. Southside of Cleveland is currently concentrated with low-income households and affordable housing developments.
4. Mortgage lending practices are to be addressed since there were high denial rates among certain races.
5. People with limited English proficiency have difficulty in maneuvering city's website as systems for disseminating information are usually in English.



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CITY OF CLEVELAND, TENNESSEE
ANALYSIS OF IMPEDIMENTS STUDY TO
FAIR HOUSING CHOICE

JURISDICTIONAL BACKGROUND DATA



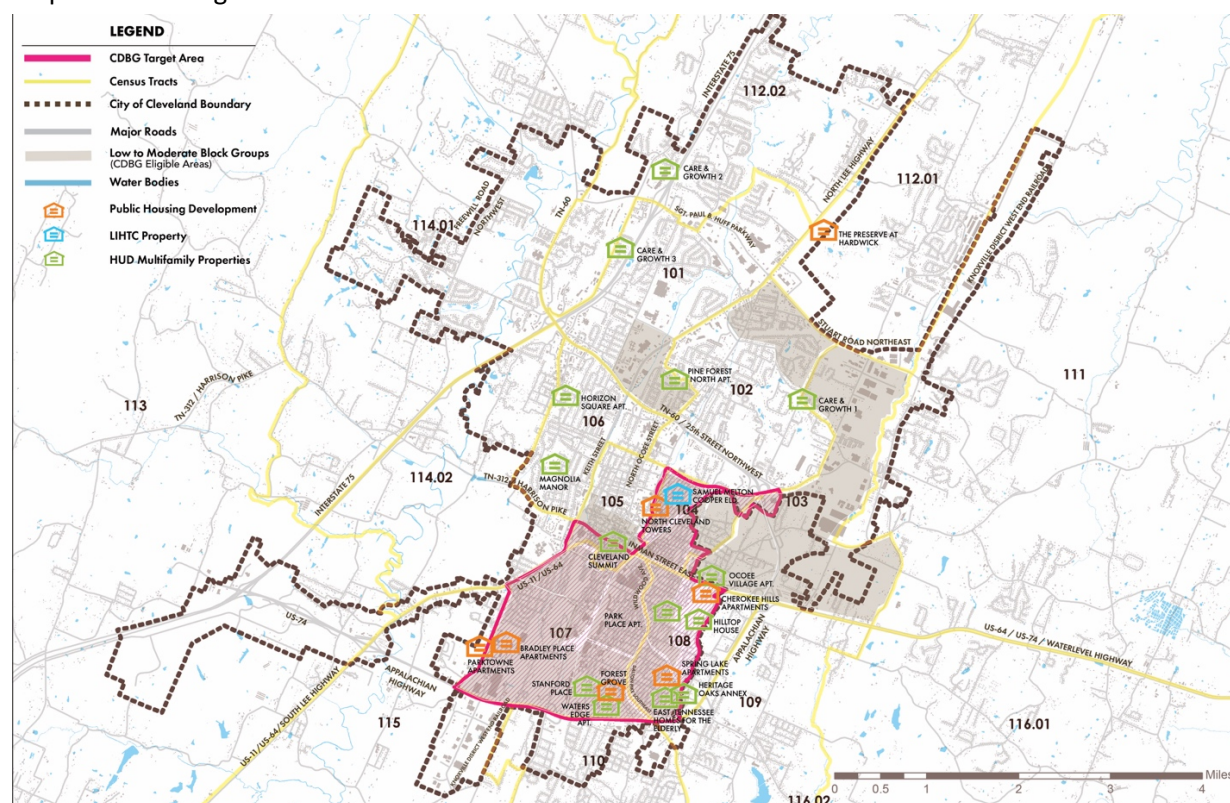


B) JURISDICTIONAL BACKGROUND DATA

1) Population

The City of Cleveland, TN is a growing city nestled between Chattanooga and Knoxville. Only 32 miles from Chattanooga, TN and 83 miles from Knoxville, TN, Cleveland provides an opportunity for many households to settle in an inviting community that is in proximity to larger cities. For the purpose of the study the City of Cleveland has established a target area that includes census tracts (CT) 107, parts of 105 and 103, and parts of 104 and 108 that are within city limits as shown in Map A.

Map A: CDBG Target Area Boundaries and Census Tracts within it



The population trends for CDBG Jurisdiction and Region show similar increase in population implying both are growing population wise, Table 1.1 elucidates this further. The population in Cleveland has increased steadily over the past decade at a rate of nearly 9% from nearly 38,000 in 2000 to 41,000 in 2010. The 2013- 2017, five-year estimates from the American Community Survey (ACS) reports the total population as 43,496 which is a 6.08% growth since 2010. Over the last thirty years, the highest population increase occurred between 1990 and 2000, as shown in Table 1.2.



Table 1.1 Population Trends in Jurisdiction and Region

Area	1990	2000	2010
Cleveland TN CDBG Jurisdiction	33,460	37,600	41,285
Cleveland TN Region	87,354	104,014	115,788

Source: ACS 2013-2017

Table 1.2 Population Change in Jurisdiction

Area	2010	2000	Change	% Change
Cleveland TN CDBG Jurisdiction	41,285	37,600	3,685	9.80

Source: ACS 2013-2017

2) Education

The City of Cleveland has a few colleges that aid in its population growth, Lee University, Cleveland State Community College, Pentecostal Theological Seminary and Franklin Academy (National Center for Educational Statistics, 2019). The colleges are situated in the heart of the city and the past decade has seen an increase in the student population. Lee University, a private Liberal Arts college, currently has a student population of nearly 5,370 students. Cleveland State Community College (CSCC) is an accredited public community college with approximately 3,500 credited and 1,500 non-credited students. CSCC employs nearly 200 employees, including faculty and staff members. The increase in the student population directly influences the age statistics. As Table 2.1 displays, highest population is recorded at 4,468 in the age group of 20-24 years followed closely by the age group of 15-19 years. The age group of 20-24 years contributes about 10.3% of the total population indicating a high number of college age students.

Additionally, in the age group of 18-24 years the educational attainment for a college degree is found to be 57.9% which suggests that college graduates are probably choosing to settle in the city. The median age for the city is 34.6 years and 6.6% of the total population is under 5 years which indicates a presence of young families too.

Table 2.1 Population by Age Cohorts

Age	Population	Percentage
Under 5 years	2,865	6.6
5 to 9 years	2,693	6.2
10 to 14 years	2,685	6.2
15 to 19 years	3,359	7.7
20 to 24 years	4,468	10.3
25 to 29 years	3,302	7.6
30 to 34 years	2,524	5.8
35 to 39 years	2,822	6.5
40 to 44 years	2,639	6.1
45 to 49 years	2,872	6.6



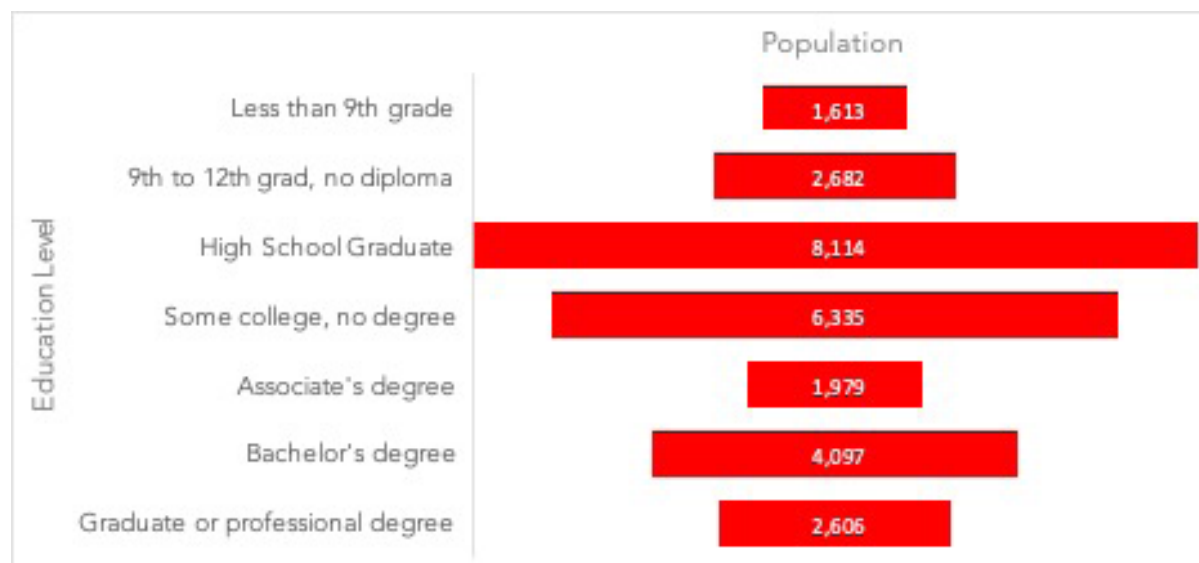
RACE

50 to 54 years	2,581	5.9
55 to 59 years	2,510	5.8
60 to 64 years	1,958	4.5
65 to 69 years	1,960	4.5
70 to 74 years	1,382	3.2
75 to 79 years	1,199	2.8
80 to 84 years	788	1.8
85 years and over	889	2

Source: ACS 2013-2017

The educational attainment figures, for population that is 25 years and over, in Cleveland further show that over 50% have a high school diploma or equivalent, with some college, displayed in Figure A below. Only 5.9% have less than a 9th grade education. Bachelor and advanced degree categories are nearly a quarter of the population at approximately 14.9% and 9.5%, respectively (ACS 2013-2017, five-year estimates).

Figure A: Educational Attainment for Population 25 years and over



Source: ACS 2013-2017

3) Race

While age and educational attainment are important factors in reviewing policies in a city, race is a crucial aspect as well. From the trends it is evident that White, Non-Hispanics are the dominant race in both the jurisdiction and region. All other races- Black, Hispanic, Asian or Pacific Islander, and Native Americans are under 7% jurisdiction wise and under 5% region wise as seen in Table 3.1. Over one-third of the Hispanic population resides in the CDBG eligible area and nearly a quarter of the Asian population resides in these



areas as well. Almost 70% of the American Indian/Alaska Native population resides within the CDBG Eligible Area.

Table 3.1 Race/Ethnicity Trends for Jurisdiction and Region

	(Cleveland, TN CDBG) Jurisdiction		(Cleveland, TN) Region	
Race/Ethnicity	Number	Percent	Number	Percent
White, Non-Hispanic	34,290	83.06%	103,851	89.69%
Black, Non-Hispanic	2,705	6.55%	4,166	3.60%
Hispanic	2,866	6.94%	4,897	4.23%
Asian or Pacific Islander, Non-Hispanic	516	1.25%	890	0.77%
Native American, Non-Hispanic	104	0.25%	304	0.26%
Two or More Races, Non-Hispanic	750	1.82%	1,565	1.35%
Other, Non-Hispanic	54	0.13%	115	0.10%

Source: Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T) Table1, Version AFFHT0004

Table 3.2 indicates that Hispanic population has increased from 1990 to 2010, it has increased from 1.34% to 6.94% respectively. African-American, Hispanic, Asian or Pacific Islander, and Native Americans have increased in numbers from 1990 to 2010 but the current data shows a slight decrease in the numbers of Asian or Pacific Islander, and Native Americans in the Cleveland CDBG jurisdiction and the region. Black, Non-Hispanics have increased in the CDBG jurisdiction but show a slight decrease in the region as per the current trend reported on the Affirmatively Furthering Fair Housing Mapping and Data tool provided by HUD.

Table 3.2 Race/Ethnicity Trends for Jurisdiction and Region

	(Cleveland, TN CDBG) Jurisdiction				(Cleveland, TN) Region			
Race/Ethnicity	1990 Trend	2000 Trend	2010 Trend	Current	1990 Trend	2000 Trend	2010 Trend	Current
White, Non-Hispanic	30,703	33,428	34,290	34,290	83,229	96,597	103,851	103,851
Black, Non-Hispanic	2,059	2,473	3,116	2,705	2,859	3,757	4,858	4,166
Hispanic	448	1,034	2,866	2,866	734	1,932	4,897	4,897
Asian or Pacific Islander, Non-Hispanic	124	372	606	516	250	648	1,095	890
Native American, Non-Hispanic	85	276	339	104	201	869	944	304

Source: AFFH-T Table 2, Version AFFHT0004

Table 3.3 Race/Ethnicity Dissimilarity Trends for Jurisdiction and Region

	(Cleveland, TN CDBG) Jurisdiction				(Cleveland, TN) Region			
Racial/Ethnic Dissimilarity Index	1990 Trend	2000 Trend	2010 Trend	Current	1990 Trend	2000 Trend	2010 Trend	Current
Non-White/White	29.02	23.17	16.62	19.21	39.85	28.62	30.54	34.92
Black/White	35.56	32.74	25.46	31.13	49.51	41.60	38.88	43.68
Hispanic/White	17.42	16.16	14.90	17.17	29.82	23.25	30.34	33.05



RACE

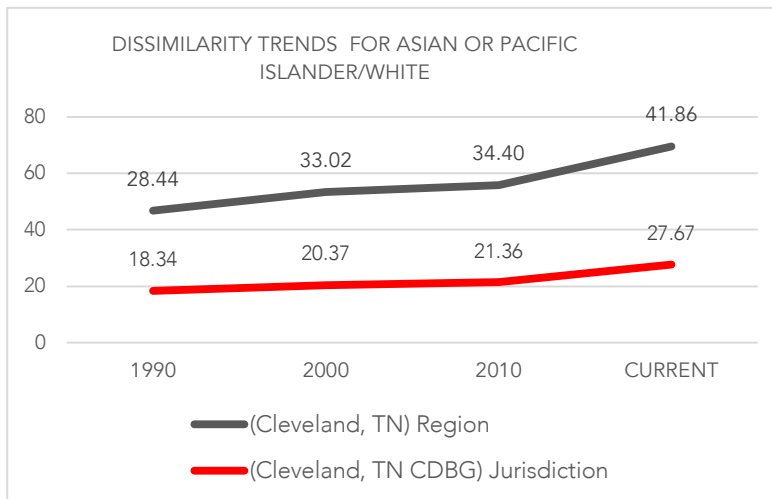
Asian or Pacific Islander/White	18.34	20.37	21.36	27.67	28.44	33.02	34.40	41.86
Note 1: Data Sources: Decennial Census								
Note 2: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).								

Source: AFFH-T Table 3, Version AFFHT0004

Broadly, the dissimilarity trends as shown in Table 3.3 from 1990 onwards indicate low to moderate (40-54) levels of segregation in the region while the Cleveland CDBG jurisdiction has low levels (<40) of segregation. Although, the segregation levels are low in the CDBG jurisdiction, but a few concerning observations can be made from the trends reported above:

- 1) levels of segregation were decreasing from 1990-2010 in the CDBG jurisdiction, but the current levels show that they are rising by almost 3% for non-whites/whites and Hispanic/white, and 6% for black/white and this trend duplicates itself in the region as well.
- 2) In the CDBG jurisdiction, the level of segregation for Asian or Pacific Islander/White has been increasing over the years. It has increased by 10% in the CDBG jurisdiction between the current reported year and 1990. This trend has been reciprocated at the regional level bringing Asian or Pacific Islander/White into the moderate level of segregation implying that diversity in the city could be decreasing if these trends continue as seen in Figure B.

Figure B Dissimilarity Trends for Asian or Pacific Islander/White



Source: Created from AFFH-T Table 3, Version AFFHT0004

- 3) Segregation levels for Black/White decreased from moderate to low in the region over time but the current data is suggesting that the segregation levels are increasing again to moderate. While the segregation is still low at the CDBG jurisdiction level, but it seems to have increased between 2010 and the current data time.
- 4) The target area is predominantly white, but clusters can be noted in CT 107 and CT 104 of African Americans, CT 107 has high concentration of Hispanics, and CT 105 has multiple minorities residing in it.



4) National Origin

Table 4.1 lists the top ten countries of origin both in CDBG jurisdiction and the region. 1.51% of people in Cleveland City have reported Mexico as their country of origin and a large part of them seem to be concentrated in the CDBG jurisdiction area. People whose country of origin is Honduras, China excluding Hong Kong and Taiwan, and India are majorly concentrated in the CDBG jurisdiction area. People with national origin in Guatemala, Philippines, and Russia seem to be concentrated in the region outside of the CDBG jurisdiction while people with national origin in Korea, Poland and El Salvador are grouped in the CDBG jurisdiction indicating possible clusters (figure C). Further, the trends from Table 4.2 indicate a general increase in the number of foreign-born people in the CDBG jurisdiction and region. The trends from 1990 to current data time also indicate a general predilection of foreign-born people towards the CDBG jurisdiction with a high increase of 2,028.

CT 102 has the most people whose country of origin is Mexico and Honduras followed by CT 107, CT 114, and CT 110. CT 108 has the most concentration of China born individuals and CT 112 has people whose country of origin is Mexico, and India.

In the CDBG target area, CT 108 and CT 107 has most people born in China, while CT 107 also has considerable population whose country of origin is Mexico, and Honduras.

Table 4.1 National Origin

	(Cleveland, TN CDBG) Jurisdiction			(Cleveland, TN) Region		
National Origin	Country	#	%	Country	#	%
#1	Mexico	1,194	3.06%	Mexico	1,662	1.51%
#2	Honduras	248	0.64%	Ukraine	251	0.23%
#3	India	161	0.41%	Honduras	248	0.23%
#4	China excl. Hong Kong & Taiwan	142	0.36%	Vietnam	196	0.18%
#5	El Salvador	72	0.18%	Guatemala	188	0.17%
#6	Canada	62	0.16%	Canada	181	0.16%
#7	Vietnam	60	0.15%	India	180	0.16%
#8	Korea	57	0.15%	Philippines	146	0.13%
#9	Poland	52	0.13%	China excl. Hong Kong & Taiwan	142	0.13%
#10	Ukraine	51	0.13%	Russia	85	0.08%

Source: AFFH-T Table 1, Version AFFHT0004

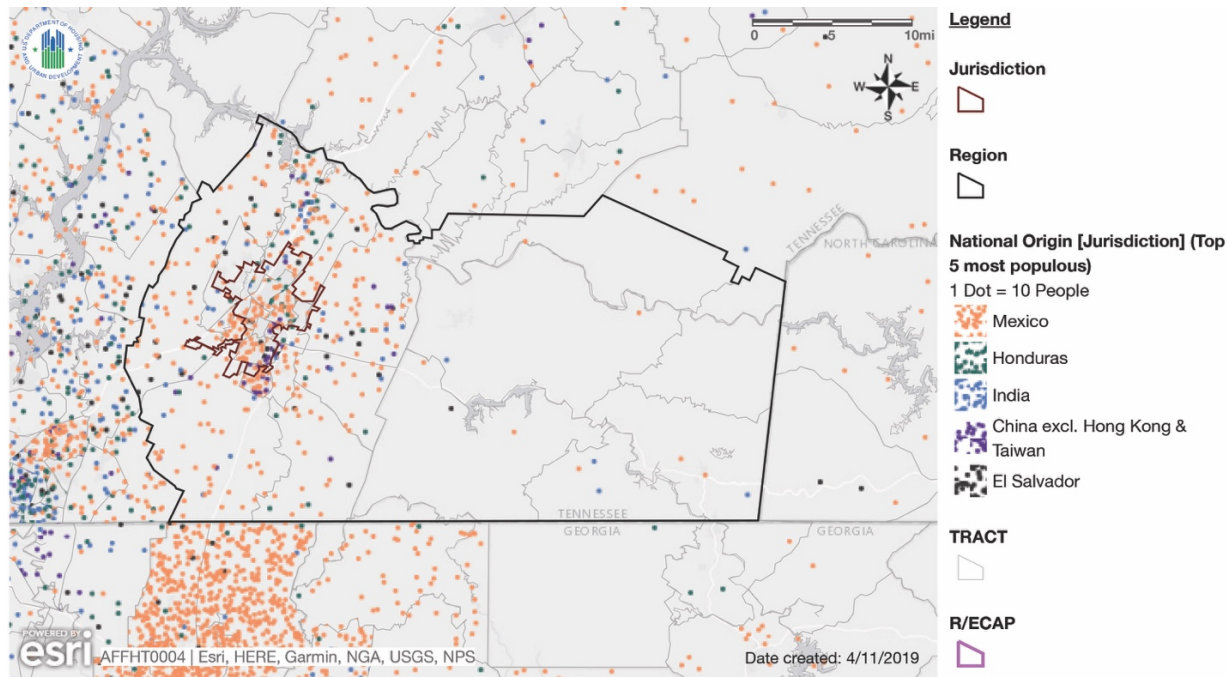
Table 4.2 National Origin Trends

National Origin	(Cleveland, TN CDBG) Jurisdiction				(Cleveland, TN) Region			
	1990 Trend	2000 Trend	2010 Trend	Current	1990 Trend	2000 Trend	2010 Trend	Current
Foreign-born	489	1,317	2,252	2,517	870	2,090	3,677	4,312

Source: AFFH-T Table 1, Version AFFHT0004



Figure C. National Origin Dot Density Map



Source: AFFH Data and Mapping Tool

5) Limited English Proficiency (LEP) Language

Concurrent with data of people born in foreign countries, the limited English proficiency language table 5.2 indicates an increase in the number of people who are not proficient in English language from 1990 to the current data point. Both the jurisdiction and the region show languages like Spanish, Chinese and Gujarati (table 5.1) as the primary language for a few people in the CDBG which corresponds with people born in Mexico, China and India see Figure C and Figure D for more clarity.

Table 5.1 Limited English Proficiency Language

	(Cleveland, TN CDBG) Jurisdiction			(Cleveland, TN) Region		
LEP		#	%		#	%
#1	Spanish	1,545	3.96%	Spanish	2,088	1.90%
#2	Chinese	134	0.34%	Other Slavic Language	193	0.18%
#3	Gujarati	86	0.22%	Chinese	134	0.12%
#4	Vietnamese	47	0.12%	Gujarati	86	0.08%
#5	African	35	0.09%	Vietnamese	79	0.07%
#6	Serbo-Croatian	34	0.09%	Russian	51	0.05%
#7	Other Slavic Language	24	0.06%	Tagalog	51	0.05%
#8	Urdu	21	0.05%	African	35	0.03%
#9	Other & Unspecified Language	20	0.05%	Serbo-Croatian	34	0.03%
#10	Polish	19	0.05%	French	32	0.03%

Source: AFFH-T Table 1, Version AFFHT0004



JURISDICTIONAL BACKGROUND DATA

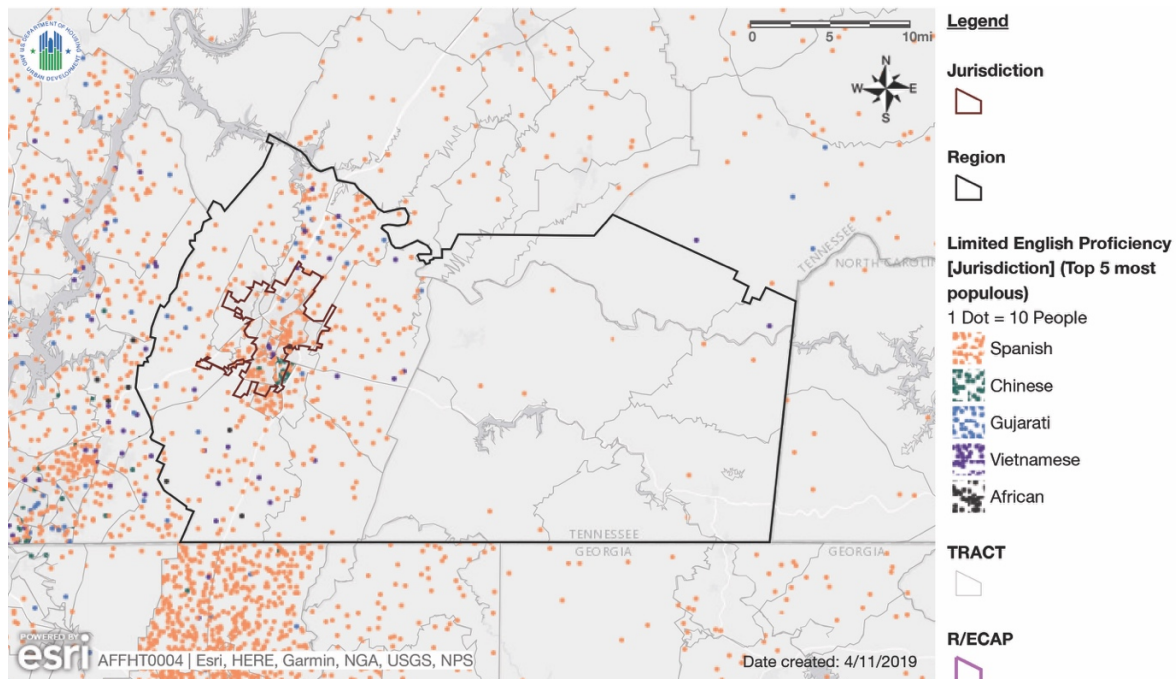
LIMITED ENGLISH PROFICIENCY (LEP) LANGUAGE

Table 5.2 Limited English Proficiency Language Trend

	(Cleveland, TN CDBG) Jurisdiction				(Cleveland, TN) Region			
LEP	1990 Trend	2000 Trend	2010 Trend	Current	1990 Trend	2000 Trend	2010 Trend	Current
Limited English Proficiency	491	975	1,457	1,881	912	1,671	2,171	2,927

Source: AFFH-T Table 1, Version AFFHT0004

Figure D. Limited English Proficiency Language Dot Density Map



Source: AFFH Data and Mapping Tool

Census Tract 102 seems to have the highest concentration of people that speak Spanish and also have limited English language proficiency. CT 107, 110, and 114 have 280, 197, 170 Spanish speaking people respectively. CT 108 has the most concentration of people speaking Chinese and census tract 112 has a mix of Spanish speaking and Gujarati speaking residents. This corresponds with the dot density map displaying people of foreign origin which shows census tract 108 having the most concentration of China born individuals and 112 having people whose country of origin is Mexico, and India. When compared to the region, the density of people speaking foreign languages is more concentrated in the jurisdiction than the region, especially on the South side of the jurisdiction.

6) Disability Type

13,304 people in the CDBG jurisdiction are facing some difficulty physically about 3,500 people have an ambulatory difficulty, 2,729 people have cognitive difficulties, 2,529 have independent living difficulty, 1,829 have some hearing difficulty, 1,448 have a self-care difficulty and 1,256 have a vision problem. It is important to note here that some people could be accounted for more than one disability. Further, the dot density map didn't reveal any spatial clusters of people with disabilities, however the concentration of people experiencing difficulties was high in and around the CDBG jurisdiction with access to healthcare



being a possible reason. The census tracts that have highest number of people with disabilities are CT 107, CT 104, and CT 101 with 1,936, 1872, and 1,730 respectively. Of note is that CT 104, and CT 107 are included in the present CDBG target area.

Table 6.1 Disability Type

	(Cleveland, TN CDBG) Jurisdiction		(Cleveland, TN) Region	
Disability Type	Number	Percentage	Number	Percentage
Hearing difficulty	1,829	4.79%	6,507	5.96%
Vision difficulty	1,256	3.29%	5,108	4.68%
Cognitive difficulty	2,729	7.15%	8,201	7.52%
Ambulatory difficulty	3,513	9.20%	11,807	10.82%
Self-care difficulty	1,448	3.79%	4,344	3.98%
Independent living difficulty	2,529	6.63%	7,415	6.80%

Source: AFFH-T Table 2, Version AFFHT0004

7) Employment & Income

According to the recent ACS (2013-2017), over 60% of the population 16 years and over is in the labor force with 55.80% of them employed. Overall, the city experienced a 12% unemployment rate as late as 2012 according to the ACS 2008-2012 estimates. The US Department of Labor reported a 3.2% unemployment rate for the month of Feb 2019 in Cleveland, TN in comparison to the nation's unemployment rate at 3.8%.

Table 7.1 Employment Status for the Civilians Employed Population 16 years and over

Subject	Total	Percentage
Civilians employed population 16 years and over	34,724	
In labor force	20,935	60.3
Civilian labor force	20,923	60.3
Employed	19,391	55.8
Unemployed	1,532	4.4
Armed force	12	0
Not in labor force	13,789	39.7

Source: ACS 2013-2017

The prevalent occupation of the civilian employed population 16 years and over is "Educational services, and health care and social assistance" category at nearly 20.7% employment rate as shown in Table 7.2. At 17.19% manufacturing jobs also seem quite popular in Cleveland City followed by Arts, entertainment and recreation, accommodation, and food services. The lowest employees are in the agriculture, forestry, fishing and hunting, and mining sector with 0.18% employees reported in the ACS 2013-2017.



Table 7.2 Occupations for the Civilians Employed Population 16 years and over

Subject	Total
Civilian employed population 16 years and over	19,391
Agriculture, forestry, fishing and hunting, and mining	34
Construction	1,037
Manufacturing	3,333
Wholesale Trade	363
Retail trade	2,288
Transportation and warehousing, and utilities	1,109
Information	283
Finance and insurance, and real estate and rental and leasing	983
Professional, scientific, and management, and administrative and waste management services	1,459
Educational services, and health care and social assistance	4,053
Arts, entertainment, and recreation, and accommodation and food services	2,612
Other services, except public administration	1,388
Public Administration	449

Source: ACS 2013-2017

Further, top employers reported by the Cleveland-Bradley County Economic Development Council elucidate the above findings as 1,200 employees work for Bradley County Schools, and 1120 for Tennova, healthcare service provider. However, the largest employer with 1,435 employees is Whirlpool Corporation's Cleveland Division. Amazon, and Peyton's Southeastern are two more prominent employers for the region supporting employment in retail and warehousing respectively. Cleveland City Schools and Lee University also employ about 600 employees each making their presence substantial for the economic prosperity of the city.

Table 7.3 Top Employers

Company	Employment
Whirlpool Corporation, Cleveland Division	1435
Bradley County Schools (includes cafeteria)	1200
Tennova	1120
Amazon	1101
Peyton's Southeastern	1100
Jackson Furniture	852
WACKER Polysilicon	682
Cleveland City Schools	664
Walmart (two stores)	640
Bradley County Government (includes law enforcement and corrections)	620
Lee University	593



Mars Chocolate North America	575
Bayer (formerly Merck)	513
Life Care Centers of America	450
Whirlpool Xperience Center (call center)	385
Olin Corporation	350
City of Cleveland (not including seasonal part-time)	340
DHL Supply Chain (formerly Exel, Inc.)	340

Source: Cleveland/Bradley Economic Development Council, May 2018

Access to work and home form the major commute for any city or any jurisdiction. Fair means of transportation and the ability of a city to provide access to all is crucial. Cleveland Urban Area Transit System (CUATS) operates in the city serving Northern and Southern Cleveland through 5 bus routes and 30 min to 60 min service schedule, 5 days a week. Full fare with transfers is \$1, fare for disabled and elderly is \$0.50, the regular monthly bus pass with unlimited rides costs \$20, and monthly bus pass for disabled and elderly with unlimited rides costs \$10 (Cleveland Urban Area Transit Agency). Table 7.4 indicates that only 0.40% of the population over 16 years that go to work choose public transportation as an option, 4.50% walk, only 0.10% bike and 8.10% like to carpool in a car, van or truck. While 81.30% prefer to drive alone in a car, truck, or van as a means to commute to work. The mean travel time was reported to be 18.6 minutes in ACS 2013-2017. Additionally, 18.60 % of the people worked outside their county of residence and 2.5% also worked outside the state of residence (Table 7.5). Despite availability of public transit, the ridership for CUATS is poor and transit routes do not offer out of city and state routes. Additionally, there seems to be a disconnect between affordability and usage which implies that probably better integration is needed.

Table 7.4 Means of Transportation to work

Subject	Percentage
Car, truck, or van - drove alone	81.30
Car, truck, or van - car pooled	8.10
Public transportation	0.40
Walked	4.50
Bicycle	0.10
Taxicab, motorcycle, or other means	1.40
Worked at home	4.20

Source: ACS 2013-2017

Table 7.5 Place of Work

Subject	Total
Worked in state of residence	97.50
Worked in county of residence	78.90
Worked outside county of residence	18.60



Worked outside state of residence	2.50
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Source: ACS 2013-2017

Household income also can provide the city with greater details about fair housing policies and procedures. Of the 16,341 households reporting income in Cleveland, the median household income has been estimated to be \$41,570, as indicated in Table 7.6 by ACS (2013-2017). The income category with the highest percentage of households is between the "\$35,000 to \$44,999" category at 17.80%. Trailing just below at 15.79% is the "\$50,000 to \$74,999" category.

Table 7.6 Income and Benefits

Income and benefits (in 2017 inflation adjusted dollars)	Number	Percentage
Total households	16341	
less than \$10,000	1677	10.26
\$10,000 to \$14,999	1204	7.37
\$15,000 to \$24,999	2148	13.14
\$25,000 to \$34,999	1810	11.08
\$35,000 to \$44,999	2908	17.80
\$50,000 to \$74,999	2581	15.79
\$75,000 to \$99,999	1637	10.02
\$100,000 to \$149,999	1360	8.32
\$150,000 to \$199,999	458	2.80
\$200,000 or more	558	3.41
Median household income (dollars)	41570	X
Mean household income (dollars)	63716	X

Source: ACS 2013-2017

In the CDBG eligible area, median household income in the CTs range from a high of \$40,421 in CT 102 to a low of \$16,385 in CT 104. Within Census Block 1 of CT 104 over 50% of households have incomes less than \$15,000, and more than one in three have household income less than \$10,000.

U.S. Department of Housing and Urban Development's (HUD) income limits in Table 7.7 show the median income limit as well as HUD income limit categories-low, very low, and extremely low-income limits. HUD uses its own measure for calculating the median family income for each jurisdiction it is called HUD Area Median Family Income (HAFMI), it allows HUD to determine Fair Market Rents and income limits for its various housing programs. To qualify for HUD programs, a household would make less than 80% of the area median income. According to Table 7.7, approximately 59.64% of the total households (that reported income) in Cleveland are considered to be low-income households.



Table 7.7 HUD Income Limit Categories

	Median Income	FY 2018 Income Limit Category	Persons in Family							
			1	2	3	4	5	6	7	8
Cleveland TN MSA	\$59,100	Very Low (50%) Income Limits	20,350	23,250	26,150	29,050	31,400	33,700	36,050	38,350
		Extremely Low-Income Limits (30% Income)	12,250	16,460	20,780	25,100	29,420	33,700	36,050	38,350
		Low (80%) Income Limits	32,550	37,200	41,850	46,500	50,250	53,950	57,700	61,400

Source: Housing and Urban Development FY 2018, Income Limits Documentation System

According to the 2013-2017 American Community Survey (ACS) estimates, approximately 22% of all people whose income was reported are below poverty level. Approximately 1,700 families that reported income are below poverty level at a rate of 17.0% which is higher than the national poverty level of 10.5%. The largest demographic living in poverty is female with 23.7% below poverty level.

The most common racial or ethnic group determined by families with a householder of a certain race living below the poverty line is White, followed by Black or African American alone. ASC reports that 35.4% of all families for whom poverty level is reported are of Hispanic or Latino origin (of any race) and 15.5% are White alone, not Hispanic or Latino.

For people living at less than 50% of the poverty level 8.8% of them are foreign born and 9.1% have a disability. 30.7% children (2,900) are in households for whom poverty status is determined in the past 12 months are below poverty level.

In the CDBG eligible area, CT 104 has more than 54% low income households, more than 70% moderate income households, and the number of extremely low-income households lie in the range of 25% to 38%. CT 107 and CT 108's low-income households are in the range of 39 to 54% and moderate-income households fall in the range of 53% to 70% and for extremely low-income households the range for CT 108 is 25% to 38% while for CT 107 it is 15% to 25% (HUD eGIS Storefront). The rate of families with incomes below the poverty level ranges from a high of 51% in CT 104 to a low of 12% in CT 102; and the poverty rate for families in Cleveland as a whole is 17%.

8) Housing Profile

Cleveland currently has 17,954 housing units and 90% of them are occupied (ACS, 2013-2017) with 46.7% of them being owner occupied and 53.3% being renter occupied as shown below in table 8.1.



Table 8.1 Housing Characteristics

Housing Occupancy	Estimate
Total housing units	17,954
Occupied housing units	16,341
Vacant housing units	1,613
Housing Tenure	
Owner occupied housing units	7,632
Renter occupied housing units	8,709

Source: ACS 2013-2017

As shown in Table 8.2, nearly 57.91 % of the housing units in Cleveland are one-unit, detached housing units while nearly 32.15% are considered to be multi-unit dwellings. One-third of the multi-unit dwellings are 3 or 4 units, followed by housing with 5 to 9 units. Mobile homes have a substantial presence at 2.61% almost equivalent to the number of 1 unit attached housing type.

Table 8.2 Housing units in structures

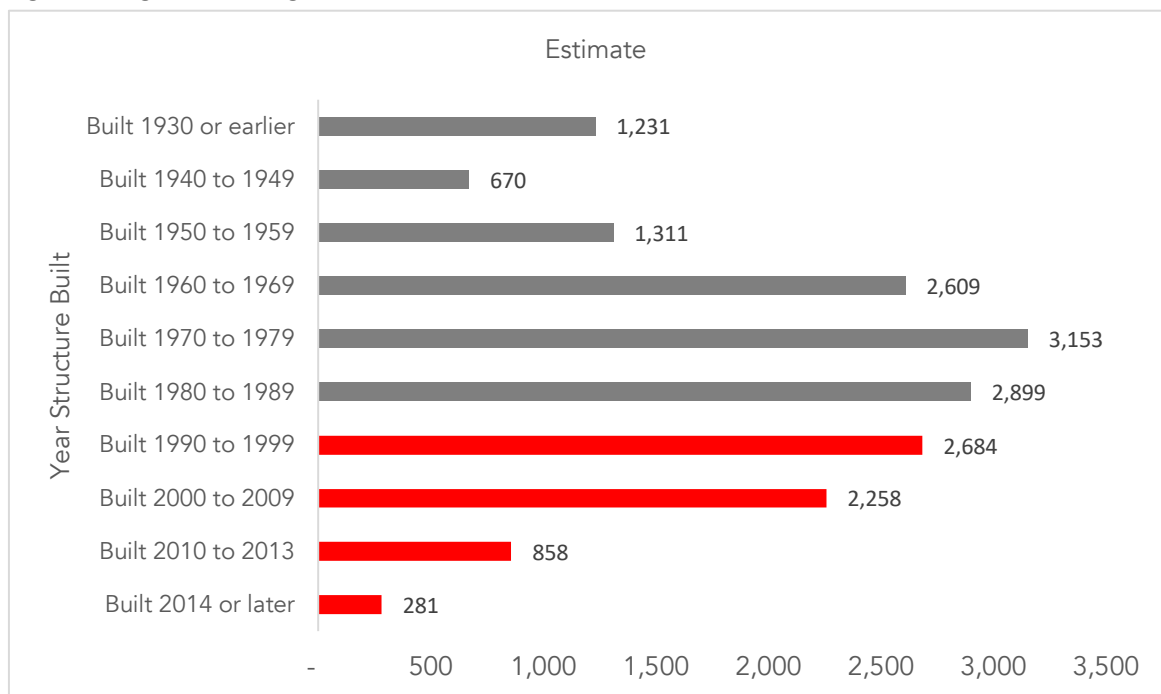
Units in structure	Estimate
1 unit, detached	10,398
1 unit, attached	531
2 units	1,555
3 or 4 units	1,949
5 to 9 units	1,719
10 to 19 units	549
20 or more units	785
Mobile home	468
Boat, RV, Van, etc.	-

Source: ACS 2013-2017

Of the housing stock in Cleveland, the highest percentage of housing units was built between 1970-1979 at 17.56% followed by 1980-1989 at 16.15%. Figure E shows how that 66.13% of the housing units in the city are over 20 years old and almost 50% are estimated to be older than 40 years. With such an old housing stock, rehabilitation efforts may be required for the safety and security of the residents. With over 50% of households in Cleveland at or below HUD's low-income standards, additional efforts may need to be considered at governmental level.



Figure E: Age of Housing units in Cleveland, TN



Source: ACS 2013-2017

HUD's housing data shows the number and percentages of owner-occupied and renter-occupied units by the year housing units were built as seen in Table 8.3. In the past thirty years, there has been a rise in the buildings that accommodate renter-occupied units than owner-occupied units. Overall, the highest number of units were built between 1950-1979, implying that many of the units could be in need of repairs. They could be below current housing standards, material and safety compliance could be an issue in these older structures, especially in low-income areas.

Table 8.3 Owner and Rental Details for Housing units in Cleveland

Year Unit Built	Owner Occupied		Renter Occupied	
	Number	Percentage	Number	Percentage
2000 or later	1,470	20	1430	17
1980-1999	2,060	27	2790	33
1950-1979	3,220	43	3420	40
Before 1950	785	10	830	10
Total	7,535	100	8470	100

Source: ACS 2013-2017

Almost 40% of the housing stock (7,535) in Cleveland is owner occupied units as seen in Table 8.3. Table 8.4 below shows that the highest percentage of housing value lies in the \$150,000 to \$199,999 category with almost 24.15% housing units in this category. Further, highest category under which 21.61% of housing units fall is in the range of \$100,000-\$149, 999. The median housing value for owner occupied



housing units is \$159,200 which is 34,300 less than the national median housing value. However, looking at the rate of poverty and median household income the housing values still seem high and it seems that only a small percentage of the population could afford to own. Additional assistance may be required for residents from low to moderate income households

Within the CDBG eligible area there are 6,395 total housing units. Owner occupancy ranges from a high of 59% in Block Group 1 of CT 103 to a low of 7% in Block Group 2 of CT 105. The median value of owner-occupied housing units ranges from \$56,600 in Block Group 1 of CT 103 to \$194,200 in Block Group 1 of CT 102. This concentrates families with lower incomes in areas with lower housing values where they can afford housing which in turn makes conditions worse for the CDBG target area.

Table 8.4 Housing Values

Housing Value for Owner Occupied Units	Estimate
Less than %50,000	453
\$50,000 to \$99,999	1,271
\$100,000 to \$149,000	1,649
\$150,000 to \$199,999	1,843
\$200,000 to \$299,999	1,446
\$300,000 to \$499,999	688
\$500,000 to \$999,999	206
\$1,000,000 or more	76
Median Housing Value (dollars)	159,200

Source: ACS 2013-2017

Renter occupied housing units make up almost 52% of the total occupied housing units in the city. The median rent is nearly \$728 per month, as shown in Table 8.5. Nearly 64% of the renter occupied units paid between \$500-\$999 per month while 17% of households paid more than \$999, and 17% paid less than \$500 per month. According to the National Low-Income Housing Coalition (NLIHC) the monthly rent affordable at mean renter wage is \$632 and monthly rent affordable at 30% of area median income is \$443. NLIHC estimates that a renter must earn \$14.62 in Cleveland MSA to afford a 2 bedroom's fair market rent. The estimated hourly mean wage in Cleveland MSA is \$12.15 implying that a renter should have 1.2 full time job at mean renter wage to afford a 2-bedroom housing unit at fair market rent. In the CDBG target area the gross rent ranges from \$458 in Block Group 3 of CT 107 to \$877 in Block Group 2 of CT 103.

Table 8.5 Gross Rent Value Table

Gross Rent (Occupied Units Paying Rent)	Estimate Number
Less than \$500	1,491
\$500 to \$999	5,528
\$1,000 to \$1,499	1,046



\$1,500 to \$1,999	283
\$2,000 to \$2,499	54
\$2,500 to \$2,999	56
\$3,000 or more	73
Median dollars	728
No rent paid	178

Source: ACS 2013-2017

When evaluating mortgages and rents in the area, it is important to evaluate the housing costs with overall gross annual income. HUD suggests that households paying more than 30% of their income on housing costs (mortgage/rent payments and utilities) are cost-burdened. According to ACS 2013-2017 (table 8.6), almost 50% of the renters are paying more than 30% of their income towards rent. AFFH tool in its analysis of fair housing also provides data to supplement the understanding of cost burden on renters and owners as shown in table 8.7 and 8.8. Renters are considered to be the most cost-burdened at approximately 25% of them paying more than 30% of their income towards rent.

Table 8.6 Gross Rent as a percentage of Household Income

Gross rent as a percentage of household income	Estimate Number
Less than 15 percent	1,266
15.0 to 19.9 percent	1,021
20.0 to 24.9 percent	1,120
25.0 to 29.9 percent	786
30.0 to 34.9 percent	796
35.0 percent or more	3,362
Not computed	358

Source: ACS 2013-2017

Table 8.7 Cost Burden for Renters Income Group

Renter >30% Cost Burden by Income Group				
Household Income	0-30% AMI	>30-50% AMI	>50-80% AMI	Total Low-Mod
Number of Households	1525	1132	1285	3942
Elderly Households	295	168	275	738

Source: CHAS/IDIS 2009-2013

Table 8.8 Cost Burden for Owners Income Group

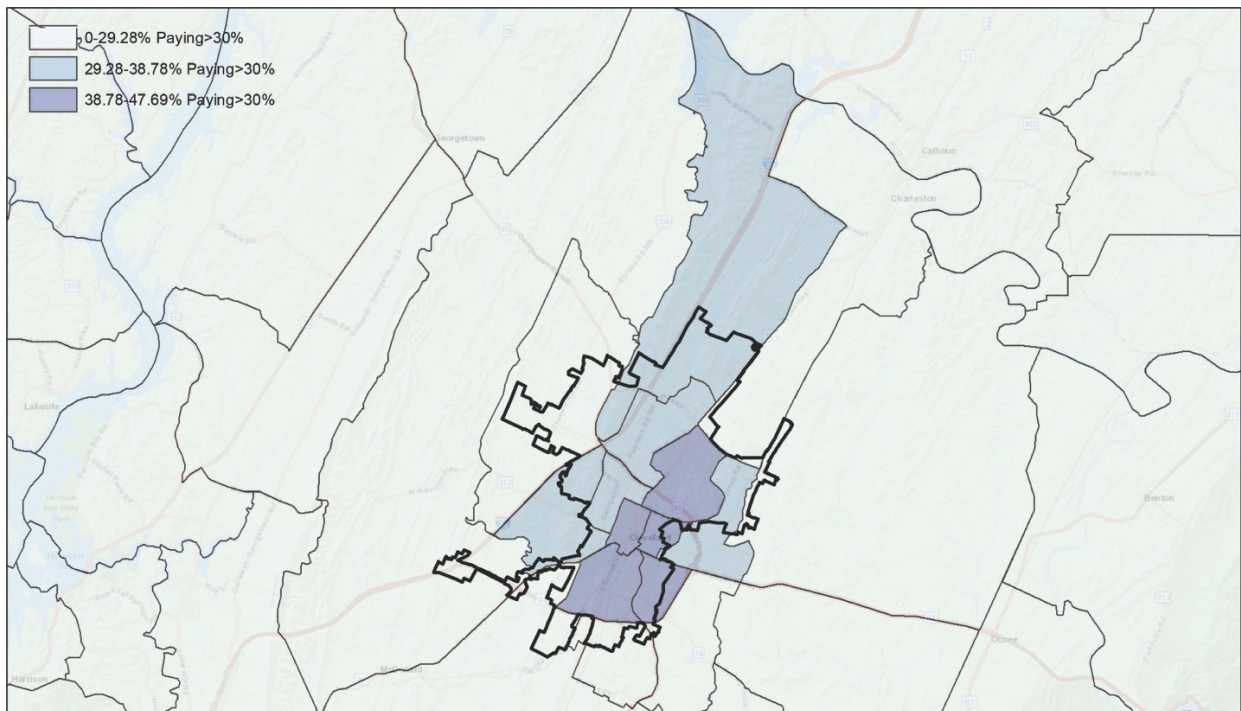
Owner >30% Cost Burden by Income Group				
Household Income	0-30% AMI	>30-50% AMI	>50-80% AMI	Total Low-Mod
Number of Households	277	312	307	896
Elderly Households	134	178	73	385

Source: CHAS/IDIS 2009-2013



As Figure F shows most of the census tracts have at least 29% of its population in cost burden according to AFFH. There are several areas indicated in the map with nearly 38 -47 % of its population marked as cost burdened.

Figure F: Map displaying cost burden households

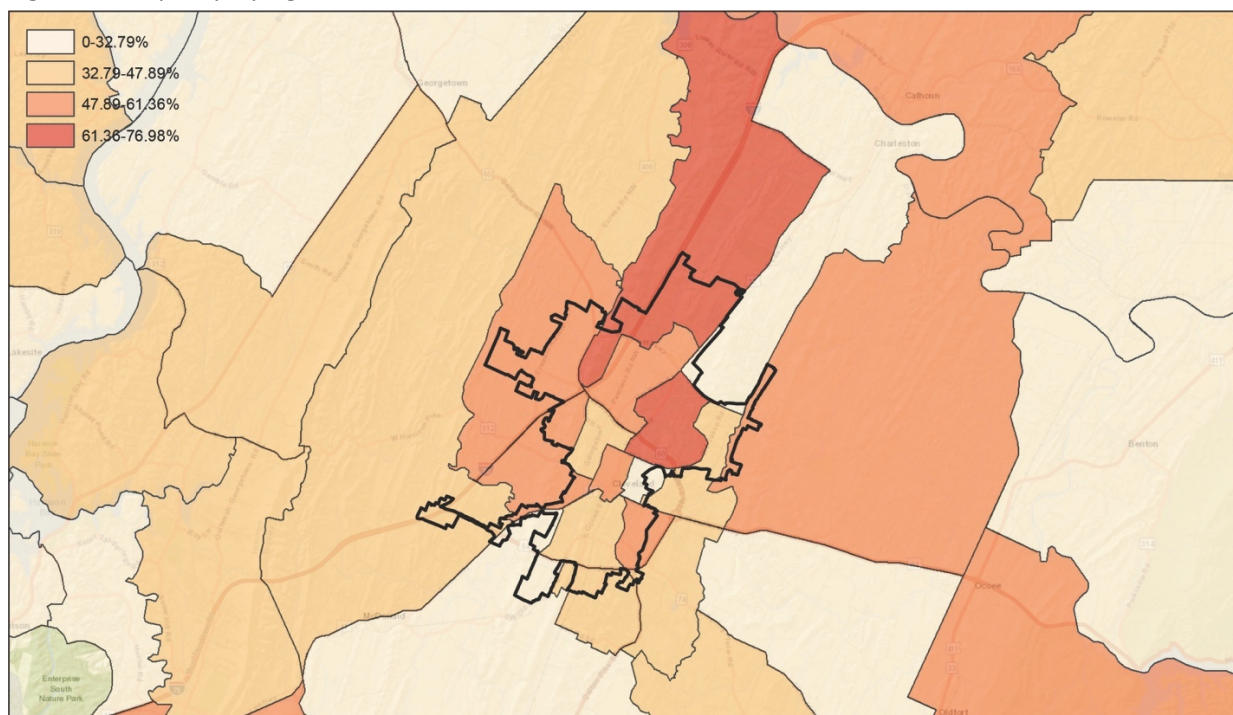


Source: CPD Maps from HUD

Figure G shows low income households with severe cost burden. Households whose monthly housing costs exceed 50% of their monthly income are defined as households under severe cost burden. More than 30% of low-income households are under severe cost burden and some areas have a higher concentration with 60% low income households experiencing severe cost burden. Within the target area, householders had cost burdens ranging from a high of over 46% in CT 107 to a low of 34% in CT 103. Regardless of the specific tract, at least one-quarter of all households are cost burdened.



Figure G: Map displaying low income households with severe cost burden



Source: CPD Maps from HUD

Cost Burden Analysis (AFFH) further reveals that 100% of Native America Islander, Non-Hispanic and more than 50% of Asian or Pacific Islander, Non-Hispanics households are under severe cost burden in the CDBG jurisdiction. Native Americans households seem to be located exclusively within the CDBG jurisdiction and 13% of the Asian or Pacific Islander households are situated in the CDBG jurisdiction. Almost 16% of White, Non-Hispanic households and 25% of Black, Non-Hispanic households are under severe cost burden.



Table 8.9 Demographics of Households with Severe Housing Cost Burden

Households with Severe Housing Cost Burden	(Cleveland, TN CDBG) Jurisdiction			(Cleveland, TN) Region		
Race/Ethnicity	# with severe cost burden	number of households	% with severe cost burden	# with severe cost burden	number of households	% with severe cost burden
White, Non-Hispanic	2235	13745	16.26	4920	40884	12.03
Black, Non-Hispanic	280	1078	25.97	355	1465	24.23
Hispanic	170	702	24.22	230	1174	19.59
Asian or Pacific Islander, Non-Hispanic	140	260	53.85	140	345	40.58
Native American, Non-Hispanic	25	25	100.00	25	114	21.93
Other, Non-Hispanic	10	85	11.76	45	361	12.47
Total	2860	15870	18.02	5715	44345	12.89
Household Type and Size						
Family households, <5 people	1191	8435	14.12	2718	27100	10.03
Family households, 5+ people	250	1240	20.16	385	3523	10.93
Non-family households	1397	6180	22.61	2620	13715	19.10
Note 1: Severe housing cost burden is defined as greater than 50% of income.						
Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.						
Note 3: The # households is the denominator for the % with problems, and may differ from the # households for the table on severe housing problems.						
Note 4: Data Sources: CHAS						
Note 5: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).						

Source: AFFH-T Table 10, Version AFFHT0004

9) Affordability

According to HUD, CT 104, CT 107, and CT 108, 38% to 69% are under housing cost burden paying more than or equal to 30% of their income towards rent or mortgage.

In the CDBG jurisdiction 70% renter units that are affordable to people who earn 80% HUD Area Median Family Income (HAFMI) lie in CT 104 and CT 108, further CT 107 and 103 fall in the range of 55-70%.

Only 31-47% renter units are affordable to people who earn 50% of HAFMI in CT 104. The CT 107 and CT 108 have 18% to 31% of the renter units that are affordable to people who earn 50% of HAFMI.

In CT 108, 11-20% of the renter units are affordable to people with 30% HAFMI.



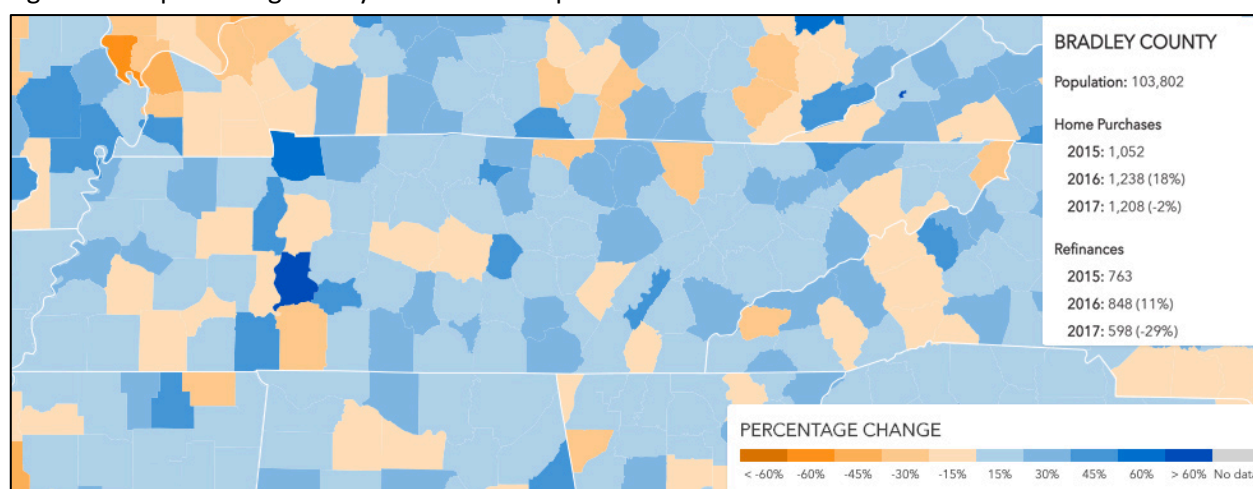
CT 104 has 25% to 45%, CT 107 and CT 108 have 14-25% of owner units are affordable to people earning 50% of HAFMI.

In CT 104 and CT 107 more than 52% of owner units that are affordable to people earning 80% of HAFMI. In CT 108 this range is within 34% -52%.

CT 104 and CT 107 have more than 58% of owner units that are affordable to people earning 100% HAFMI. In CT 108, the percentage of owner units that are affordable to people earning 100% HAFMI lies in the range of 40% -58%.

10) Home Mortgage Disclosure Act (HMDA) Data

Figure H: Map showing county data for home purchase loans



Source: Bureau of consumer financial protection

The volume of home purchase loans and refinances in Bradley County has decreased between 2016 and 2017. While there is negative 2% change in home purchase loans, refinances have gone down by 29%. In 2015, loan applications for home purchases were up by 18% and refinances were up by 11%. Table 9.1 further reveals more recent data for applications received, origin of loans, applications denied, applications withdrawn, and files closed for incompleteness. According to HMDA data, most loan originated with Whites in terms of race and Not Hispanics in terms of ethnicity. Rate of denial or non-acceptance of loan applications was found to be higher in African American, and Hispanics.



JURISDICTIONAL BACKGROUND DATA

HOME MORTGAGE DISCLOSURE ACT (HMDA) DATA

Table 9.1: Disposition of applications for FHA, FSA/RHS, VA and Conventional home-purchase loans, 1 to 4 family and manufactured home dwellings, by race, and ethnicity of applicant 2017

Race	Applications Received	Loans Originated	Apps. Approved but not Accepted	Applications Denied	Applications Withdrawn	Files Closed for Incompleteness
American Indian/Alaska Native	8	5	0	3	0	0
Asian	15	7	0	3	5	0
Black or African American	61	38	5	12	6	0
Native Hawaiian or Other Pacific Islander	6	4	0	1	1	0
White	1904	1323	59	254	169	99
2 or more minority races	1	0	0	0	1	0
Joint (White/Minority Race)	25	17	1	2	4	1
Race not available	135	67	7	38	11	12
Ethnicity						
Hispanic or Latino	71	42	3	13	8	5
Not Hispanic or Latino	1892	1340	59	240	172	81
Joint (Hispanic or Latino/Not Hispanic or Latino)	19	5	9	0	3	2
Ethnicity Not Available	173	65	10	59	15	24

Source: Aggregate Report by Bureau of Consumer Financial Protection

According to 2017 data from the Tennessee housing development authority (THDA) Cleveland MSA is 9th amongst MSA's in Tennessee for home sales. Additionally, it ranked fifth highest for loan denials among Tennessee's metropolitan areas with a 32.58% rate of denial by financial institutions (Bureau of Consumer Financial Protection).

Table 9.2 breaks down the loan types further and reflects that there were more applications for conventional home purchase loans, 1-to 4 family and manufactured home dwellings than Federal housing Administration (FHA), Farm Service Agency (FSA)/Rural Housing Service (RHS), and Veterans Affairs (VA) home-purchase loans.



Table 9.2: Loans by race and ethnicity

Loans originated for Conventional and FHA, FSA/RHS, and VA home-purchase loans, 1- to 4- family and manufactured home dwellings, by race, and ethnicity applicant, 2017		
Race	FHA, FSA/RHS, and VA home-purchase loans,	Conventional home-purchase loans
American Indian/Alaska Native	5	0
Asian	3	4
Black or African American	21	17
Native Hawaiian or Other Pacific Islander	1	3
White	576	747
2 or more minority races	0	0
Joint (White/Minority Race)	4	13
Race not available	24	43
Ethnicity		
Hispanic or Latino	26	16
Not Hispanic or Latino	579	761
Joint (Hispanic or Latino/Not Hispanic or Latino)	5	0
Ethnicity Not Available	24	41

Source: Aggregate Report by Bureau of Consumer Financial Protection

From the applications received for FHA, FSA/RHS, and VA home-purchase only 60% originated for African Americans while 75% originated for Whites. However, conventional home-purchase loans that originated for Whites were only 3% more than African Americans. Although, conventional home purchase loan applications received by American Indian/Alaska Native are only a handful, but it is important to note that all of them were denied. Most home purchase loans were allocated to Whites, while only a few were made to minorities. The minority group receiving most home purchase loans was Hispanics.

Table 9.1 provides a summary of loan denials by race, which provides greater detail into mortgage lending practices in the city of Cleveland. For example, home purchase loans to borrowers of color were denied almost at a rate of 30%. Hispanic applicants were the second highest race for loan denials. Overall when reviewing mortgage loan denials, there is a notable rate of denial rate among minority groups applicants.



CITY OF CLEVELAND, TENNESSEE
ANALYSIS OF IMPEDIMENTS STUDY TO
FAIR HOUSING CHOICE

CURRENT FAIR HOUSING LEGAL STATUS





C) EVALUATION OF JURISDICTION'S CURRENT FAIR HOUSING LEGAL STATUS

The State of Tennessee's fair housing law has received substantial equivalence certification from HUD. This certification indicates that the State has a fair housing law that provides substantive rights, procedures, remedies and judicial review provisions that are substantially equivalent to the federal Fair Housing Act and has the capacity to enforce it. The Tennessee Human Rights Commission (THRC) handles this function for the state.

The THRC has a cooperative agreement with both HUD and the Equal Employment Opportunity Commission (EEOC) that allows for the coordination of investigations of discrimination cases and avoids duplication in efforts to end discrimination. THRC's central office is located in Nashville with regional offices in Memphis, Knoxville, and Chattanooga. From the THRC website:

The Commission is an independent state agency responsible for enforcing the Tennessee Human Rights Act and the Tennessee Disability Act which prohibit discrimination in housing, employment, and public accommodation on the basis of race, color, creed, national origin, religion, sex, disability, familial status (housing only) and age (40 and over in employment). The Commission is also responsible for coordinating the State of Tennessee's compliance with Title VI of the Civil Rights Act of 1964 which prohibits discrimination based on race, color and national origin by State agencies receiving federal financial assistance.

The City of Cleveland has had only 11 reported cases of discrimination reviewed by HUD in the past 5 years, as detailed in Table 10.1. Majority of the cases were investigated to be related to disability, race, and color. One case of discrimination related to national origin and one to retaliation. 4 cases investigated were found to have "no cause determination," 5 cases "conciliated and settled successfully" and 1 case is reported as "complainant failed to cooperate."

With the small amount of cases investigated and reported, the public may not be aware of how or where to report discrimination matters related to housing.



Table 10.1 City of Cleveland HUD fair Housing Complaints 2013-2018

Filing Date	Closure Date	Bases	Issues	Case Disposition
03/19/13	04/17/13	National Origin	Discrimination in services and facilities relating to rental	Conciliation/settlement successful
04/09/14	05/28/14	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful
04/09/14	03/04/15	Race, Sex	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental	No cause determination
05/08/14	03/20/15	Retaliation	Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination
08/13/15	04/28/17	Race	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/settlement successful
12/15/16	06/29/18	Disability	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation	No cause determination
12/16/16	03/01/17	Disability	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation	Complainant failed to cooperate
05/18/17	06/28/17	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to permit reasonable modification; Failure to make reasonable accommodation	Conciliation/settlement successful
05/25/17	07/25/17	Disability	Discriminatory terms, conditions, privileges, or services and facilities	Conciliation/settlement successful
08/23/18		Race	Discrimination in terms/conditions/privileges relating to rental	
11/01/18	03/18/19	Race, Color, Sex	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination



Public Participation

An online survey was conducted for citizens on barriers to affordable housing and fair housing and 159 residents responded to the survey. The responses of the survey show an overall need for more public awareness to fair housing laws and complaint procedures.

- 1) When asked if there is enough affordable housing in Cleveland about 40% of the responses disagreed with the statement, and 27.10% strongly disagreed.
- 2) In response to the question that asked about the presence of issues related to fair housing in Cleveland 15% responded said there were issues. However, about 85% responded negatively. Some comments received mentioned the following issues faced by the respondents

background history of them or their partner as a hindrance, high rents, lack of transportation, less housing options, residents refusing to support affordable housing options in their neighborhoods, and certain areas are overlooked because of poverty.

- 3) 75.54% responded that they haven't seen or heard information regarding fair housing laws and programs.
- 4) Responses for impediments to Fair Housing choice generated the following comments:

limited options for people with disabilities, access to public transportation, few mentioned a lack of affordable housing, credit obstacles, lack of public transportation on week nights, no public transportation on weekends and a general lack of understanding of the subject.

- 5) Another question was whether language barriers makes it hard to find affordable housing about 29% disagreed and 47.40% chose the option "neither agree nor disagree." On the other hand, about 21% agree that language is a barrier in the way of finding affordable housing.
- 6) When asked if respondents experienced discrimination while looking for affordable housing, out of 154 respondents - 49 disagreed, 26 strongly disagreed, only 12 respondents agreed, and 6 strongly agreed.
- 7) In response to ample affordable housing options in the neighborhood 38.71% disagreed, 16.77% strongly disagreed, 16.77% agreed and only 1.94% strongly agreed.
- 8) When asked whether ample affordable housing options for households with disabilities was available, out of 152 responses that were gathered 85 disagreed, 17 agreed and 50 responses neither agreed nor disagreed.



- 9) In response to whether elderly residents over the age of 65 have suitable affordable housing options, only 81 respondents disagreed, 44 responses were neutral while 28 agreed.
- 10) When asked about ample affordable housing options suitable for large family households (4-5 BR housing) about 70% disagreed, only 8% agreed.
- 11) Affordable housing conditions were found suitable by only 29 respondents while 83 respondents thought otherwise.
- 12) The question about poor credits as a barrier to obtain affordable owner-occupied housing generated mixed responses as 40% agreed, and 28% disagreed.
- 13) Only about 34% respondents thought that ample jobs were available in Cleveland that pay enough to afford housing costs.
- 14) 30% respondents thought that flooding affects affordable housing neighborhoods moderately, 28.06% considered it affected a little, 7% considered it affected a lot, and about 3% thought it affected a great deal. The few comments received also pointed out areas that flood which are Candies Lane, Spring Place roads, Inman and Wildwood areas.
- 15) When asked about what residents considered barriers to affordable housing, 26.17% answered development costs, 28.19% thought not in my backyard mindset, 34.23% thought that it wasn't an interest of area developers, 38.93% considered lack of funding for interested developers, 34.23% considered lack of public transportation to public center and 17.45% considered that lack of housing types made them find other jurisdictions.
- 16) Among the suggestions for the City of Cleveland to address Fair Housing Issues, a few common responses were to increase:
 - housing types, housing choices for people with disabilities and large families, locating affordable housing in different parts of the city, more training and rules for landlords, improving access to fair housing choice.
- 17) The 97 respondents that answered the question that prioritizes City of Cleveland's six planning and development goals the following sequence was generated:
 - i. affordable housing for renters and homebuyers
 - ii. housing and supportive services for the elderly and disabled
 - iii. transitional and supportive housing needs
 - iv. public facility and infrastructure improvement
 - v. code enforcement public awareness of fair housing laws and
 - vi. lead-based paint requirements



- 18) Other suggestions for city were to improve the quality of housing in Blythe Community along with infrastructural improvements pertaining to sidewalks and transportation in the area. Improvement and maintenance of existing housing stock and roads was also suggested by residents to include. Pleasant Grove Area, Bradley County school, and Blythe Avenue were mentioned as areas that needed city's attention and more affordable housing options.



CITY OF CLEVELAND, TENNESSEE
ANALYSIS OF IMPEDIMENTS STUDY TO
FAIR HOUSING CHOICE

IMPEDIMENTS TO FAIR HOUSING CHOICE





D) IMPEDIMENTS FOR FAIR HOUSING CHOICE

PUBLIC SECTOR

Zoning and Site Selection

The city's zoning ordinance provides guidance on promoting the general welfare for the community through its zoning laws and regulations. The zoning ordinance can be an impediment to fair housing choice if definitions are not clear or present a challenge to creating and developing housing for all.

The City of Cleveland's definition of "rooming house" provides an exception for a "qualifying relations" for group homes. It states, "group homes for the disabled with not more than two (2) live-in caregivers." The Tennessee Code Annotated defines family below:

For the purposes of any zoning law in Tennessee, the classification single family residence includes any home in which eight (8) or fewer unrelated mentally retarded, mentally handicapped or physically handicapped persons reside, and may include three (3) additional persons acting as house parents or guardians, who need not be related to each other or to any of the mentally retarded, mentally handicapped or physically handicapped persons residing in the home.

This definition should be revised to reflect the state's definition to ensure group homes are legally available and consistent with state law.

Future housing developments can be located in the northern section of the city, which can increase fair housing choice. Policies can be geared to provide various housing types in all future projects such that affordability can be increased across the city that is North and South Cleveland. This will help reduce the concentration of low-income families that are prevalent in areas of affordable housing mostly CT 104.

Neighborhood Revitalization, Municipal and Other Services, Employment-Housing-Transportation Linkage

The Public Housing Authority's prioritizes supporting these three categories: elderly households, households with a disabled member, and working families. 41% of public housing units and 54% of Section 8 units are being occupied by disabled households. Out of the 420 public housing units, 73 are occupied by elderly persons and for Section 8 housing, 48 voucher holders are elderly. According to surveys these populations are also dependent on public transport for commute. Limited hours of service on weekdays and no public transportation during the weekends reduces the mobility of the people dependent on it. It hampers connectivity to places of employment, recreational services and retail centers which in turn promotes isolation of the people dependent on public transit. Inner CDBG public transportation network may be improved upon.

People who are employed outside of city limits can't be dependent on public transport which in turn limits the users. Demographic trends predict a rising population implying that the City is growing, and limited transit facilities would lead to a larger under-served population.

PHA and Other Assisted/Insured Housing Provider Tenant Selection Procedures; Housing Choices for Certificate and Voucher Holders

The Cleveland Housing Authority currently owns housing units for 420 families including units for elderly and disabled individuals in the Southeast portion of Cleveland. Tenants currently pay no more than 30% of their income on rents while HUD subsidizes the remaining cost of the units.



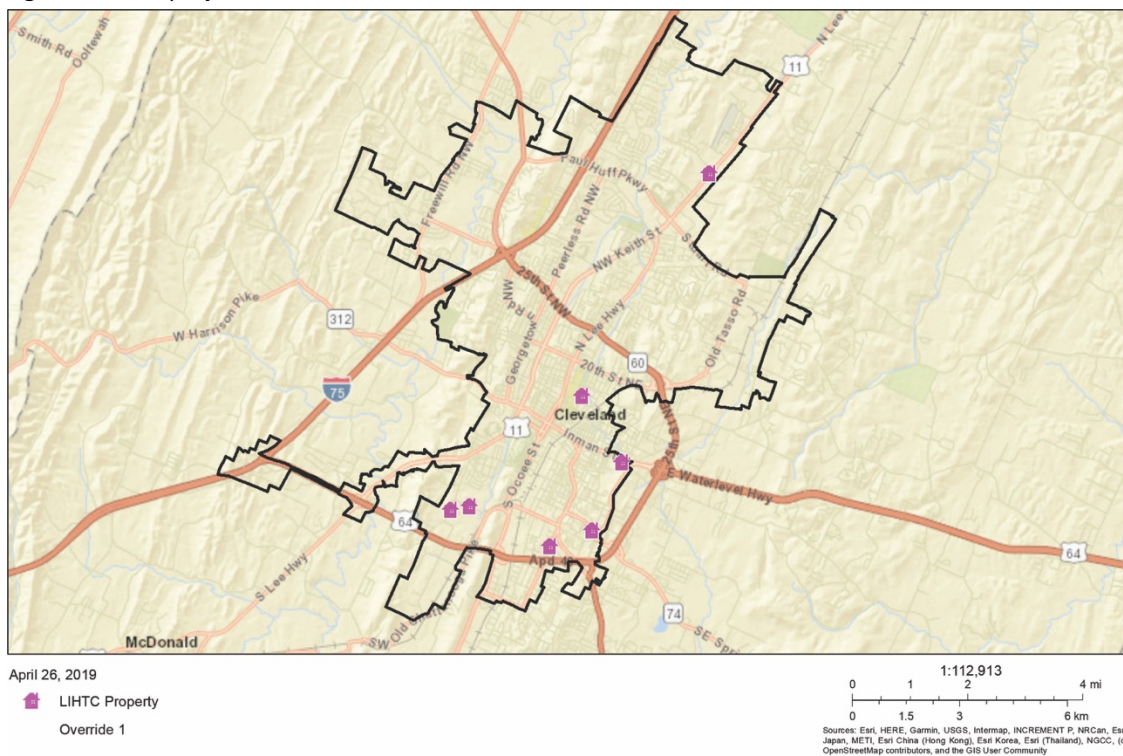
The Section 8 Housing Choice Voucher program currently serves 208 families. Housing Quality Standards (HQS) are used to qualify units for the S8/HCV program with annual inspections.

Interested applicants can review the website for vacancies for public housing and Section 8 and also download the printable application. Public housing applicants are usually on the waiting list for up to six months.

Figure J shows the amount of Low-Income Housing Tax Credit (LIHTC) projects in the Cleveland area, located primarily in South Cleveland. There are approximately 13 projects in this area with none of the developments included in Cleveland Housing Authorities unit count.

However, at that rate the absorption of the existing public housing waiting list (disregarding the match up issues of household size to number of bedrooms) would take 2.10 years without any additional new families. For section 8 housing the absorption of the existing waiting list would take 2.6 years without any additional new families.

Figure J: LIHTC projects in Cleveland



Source: CPD Maps from HUD

Sale of Subsidized Housing and Possible Displacement

According to a Consolidated Plan consultation with the Executive Director of the Cleveland Housing Authority, approximately 265 families are on the waiting list for public housing units. Nearly half of these families (136) are waiting for Efficiency and 1-Bedroom units. The Housing Authority has 420 housing units with an average annual turnover rate of approximately 30% or 126 units. At that rate of absorption of the existing waiting list (disregarding the match up issues of household size to number of bedrooms) would take 2.10 years without any additional new families. The Housing Authority also administers a tenant-based Section 8 Housing Choice Voucher Program authorized for up to 208 vouchers with an average annual turnover rate of 12%. In the last eight years



the Section 8 waiting list has been opened twice. There are approximately 64 families on the waiting list. At that rate, the absorption of the existing waiting list would take 2.6 years without any additional new families.

Property Tax Policies

For the Fiscal Year 2020 city of Cleveland's property Tax rate is \$2.06 levied on each \$100 of assessed value of all real and personal property. Taxpayers living within the city's limits will also pay the county's tax rate bringing the combined rate to \$3.77.

Planning and Zoning Boards

The municipal Planning Commission has 9 members and they meet every month. One of the members is the mayor or a representative from the Mayor's office and the others are appointed by the mayor. The term for each member is three years. The purpose of this commission is to guide development in a coordinated and harmonious way that promotes public health and safety for the general welfare of Cleveland. The Commission prepares and adopts a general land use plan, make advisory reports and recommendations on public project, mandatory referrals, zoning amendments, and zoning and subdivision proposals.

The Board of Zoning Appeals is made up of 5 persons appointed by City Council who meet every month. This board hears and decides on appeals and special exceptions of the ordinance that are made by department officials or developers. The Board decides on cases and if need arises passes variances.

Building Codes (Accessibility)

The city uses the 2209-ICC A117.1 Accessible and Usable Buildings and Facilities for its accessibility standards. These standards are acceptable for accessibility concerns.

PRIVATE SECTOR

In January 2014, a new set of mortgage lending rules went into effect for financial institutions to protect existing and potential homebuyers from risky lending. The Consumer Financial Protection Bureau outlines these mortgage rules as follows:

1. Lenders must be clear about where their money goes. Lenders are to provide a monthly billing statement outlining remaining balance, escrow amounts, and any service or transactional fees.
2. Interest rate changes have to be made apparent before it happens.
3. Lenders must intervene if a payment is missing after 36 days. Typically, the foreclosure process takes over 400 days. This will help to mitigate any requests for smaller payments.
4. Lenders must limit points and fees to no more than 3% of the loan amount. Lenders cannot promote risky features that go beyond 30 years or provide teaser rates that are interest only.
5. Debt to income ratios are critical to approving loans with the "ability-to-pay rule." Borrowers cannot exceed a 43% debt to income ratio when applying for a mortgage.

These rules may prevent some homebuyers from qualifying for a mortgage, however homebuyer and financial counseling will be necessary to prepare potential homebuyers.

Real estate professionals may also continue to be an unintentional impediment to fair housing choice. If there are only homeownership opportunities available in North Cleveland, realtors are only able to sell in those



If there are not a variety of housing types and homeownership opportunities spread throughout the city, the issue of steering is easily achieved which is illegal and ineffective for Cleveland's citizens.

PUBLIC AND PRIVATE SECTOR

Fair Housing Enforcement

The City of Cleveland currently has a website link dedicated to fair housing laws and discrimination complaint procedures. Complaints can come into the city, the Tennessee Human Relations Commission, or the US Department of Housing and Urban Development.

Informational Programs

Twice yearly, Bradley Cleveland Community Services Agency sponsors a health fair at the Senior Center. Four hundred twenty-two persons attended these events where participants gathered valuable information. Cleveland Bradley Housing Corporation uses this opportunity to disseminate information on fair housing, financial capability, homebuyer education, homeless prevention and other information to prevent foreclosures and predatory lending.

Fair Housing public service announcements on local radio station; Fair Housing message in utility bills; Resolution by Council declaring April Fair Housing Month; Habitat for Humanity, City Fields and the Cleveland Emergency Shelter, partners of the City, provide "Fair Housing, Its' Your Right brochures to all participants.

For public meetings and citizen input opportunities, the following measures are taken: Notice of all meetings in local newspaper, and city website in English and Spanish. Special accommodations were offered by legal notice (physical, non-English speaking, hearing impaired are examples).

Outreach for citizen input was also sent to over 40 agencies and non-profit organizations inviting the agency/organization and requesting the information be made available to their clients which has the ability to reach a great section of protected classes in addition to media sources.

Spanish interpreter available to attend meetings on short notice if needed. Special needs procedure that outlines hearing, visually impaired and non-English speaking and non-reading applicants, beneficiaries and general public. A current city employee is available for sign language and another is available to non-English speaking public.

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CITY OF CLEVELAND, TENNESSEE
ANALYSIS OF IMPEDIMENTS STUDY TO
FAIR HOUSING CHOICE

CONCLUSIONS & RECOMMENDATIONS





E) CONCLUSIONS AND RECOMMENDATIONS

The City of Cleveland has seen a steady increase in population over the last decade. With the national trend of aging population and increase in minority populations, it is pertinent that the city proactively adjusts policies and procedures for its continued success. THDA suggest that affordability from 2008-2012 to 2013-2017 has decreased in Bradley county by 2.5 to 5%. The housing price appreciation in Cleveland MSA had significant change in the second quarter of 2017 with 10.7% appreciation in the 2017 as compared to only 5% in 2016. Regional growth is expected to create more need for housing, employment, services, and transportation efforts. With appreciation in home value and affordability decreasing the city can actively partner with non-profits and develop strategies with developers to create affordable units. The city can continue its current fair housing practices including public outreach and participation in regional fair housing trainings and opportunities. The following lists outlines existing impediments found in the policies and procedures of both the public and private sector.

Impediments and Recommendations

1. Lack of public awareness of fair housing laws.

Although the city currently has a fair housing program, additional efforts are needed to educate and disseminate information regarding fair housing laws and complaint procedures. Disbursal of information about fair housing initiatives uses sophisticated language which is not easily understood by a larger demographic. The information has to be visible using mainstream methods so that it reaches a larger population. A few comments in the survey mentioned that notices are put in obscure places and are difficult to spot.

Recommendations:

- The city can review HUD's Fair Housing/Equal Opportunity website for public awareness options which can be further customized for Cleveland.
- The city may work with public and private sector partners to disseminate information to their customers, tenants, and clients, especially in the CDBG target area. An example would be to work with the school system to disseminate information to families about fair housing laws and complaint procedures. The city can use grocery stores, and gas stations to distribute pamphlets that inform residents about Fair housing laws. Social media is another pertinent strategy that can aid in disseminating information.
- The city can create a task force that comprises of city officials, financial institutions, real estate professionals, nonprofits, and citizens to address impediments and implement strategies.

2. Southside of Cleveland is currently concentrated with low-income households and affordable housing developments.

Low-income families do not have a choice in where they reside due to the concentration of affordable housing on the Southside of Cleveland.

Recommendations:

- The City can update its zoning code to reflect its desire to incentivize builders who build affordable units. Zoning codes can be revised to include provisions that can allow for heterogeneity in housing options. It can be achieved through density changes and land use revisions. Allowing for incentives to builders who accommodate a diverse range of housing options that caters to mixed income households. These incentives could be in the form of extra built out area or extra building height allowing such that it maximizes profit.



- Comprehensive planning efforts are required to promote wholistic development that comprises of planning for transportation, retail, education, recreation, and healthcare along with housing.
- The city should work with non-profit and for-profit developers to discuss strategies that create housing opportunities in areas outside of South Cleveland. Efforts should be made to increase affordable housing outside of Census Tracts 103, 104, 107, and 108.
- The city should work with regional housing developers, nonprofits and neighborhood associations to increase affordable housing projects.

3. Mortgage lending practices are to be addressed since there were high denial rates among certain races.

HMDA data revealed that most denials were with African American and Hispanic households for minority races. Native American applications were few in number, however it is significant because 3 out of 5 loans were denied. The Hispanic population is the second highest population and had the second highest denial rate too.

Recommendations:

- Creating more employment opportunities and helping unemployed householders by providing adequate training and skill development will improve their financial stability.
- A comprehensive plan that looks into population projections and demographic trends can help the city plan better and devise strategies that attract economic development and increase financial prosperity.
- The city can work proactively with financial institutions and banks to allow for more flexibility in payments and assist with background checks by reducing liability or providing assistance.

4. Limited English Proficiency is lacking with city's website and systems for disseminating information.

Following the recommendations from previous A.I. the city has updated its website to include Spanish. However, additional translation services for documents, mail-outs, website, and other pertinent information may be needed in languages other than English. There are other large race populations that may require information to be disseminated in languages other than English and should be accommodated accordingly.

Recommendations:

- For greater awareness for all its citizens and to include them in planning and development efforts, the city may work with local minority groups and any groups with limited English proficiency.
- Neighborhood Associations can be a vital resource in creating citizen leaders that are capable of interpreting information for racial or ethnical groups prevalent in their area.
- The city can have a resource available for translation services or a contact for dissemination of materials in languages other than Spanish.
- Public meetings can have translators or city staff capable of speaking and interpreting languages other than English.

5. Lack of landlord/tenant coordination and information.

Often tenants living in low-income units need the shelter and are afraid of eviction acts by landlords. These landlord/tenant issues are often the reason that discrimination complaints are not filed. Tenants should be aware of their rights to ensure that fairness in housing policies can be achieved. Additionally, landlords are not always familiar with the landlord/tenant act or fair housing laws.

Recommendations:

- The city can disseminate fair housing information to landlords as often as possible.



- Trainings can be provided at least once a year for both the Landlord Tenant Act and fair housing laws. If regional efforts are in place for training, then city can devise a strategy to convey this information to landlords.
- The city can create a registry or database listing landlords or repeat code offenders and create an enforcement remedy.

6. Homogeneity in housing stock

Approximately 61% of the housing units in the city are 1-unit detached structures. While people seeking affordable housing have varied household types which reflects the need of market driven planning and design.

Recommendations:

- The city's efforts for housing rehabilitation and housing modules should reflect sensitivity to its population trends and income projections.
- While housing modules should accommodate a larger variety of housing, it should also be geared towards people with disabilities and the elderly.
- Building code, building review and permitting process can include rules about accessibility so that all public and private buildings have to comply with regulations at entry, exits, corridor widths, and washrooms. Stricter rules and permitting process can be made applicable to housing projects in low-income areas.
- Location and site selection of new housing projects should be carefully planned such that it assists in linking employment-housing-transportation-retail-healthcare.

7. Reduction in federal funding to assist with affordability

With changes and revisions in government spending there has been a decline in federal resources that funded affordable projects and provided assistance to banks.

Recommendations:

- The city can disseminate fair housing information to landlords as often as possible.
- Trainings can be provided at least once a year on both the Landlord Tenant Act and fair housing laws. If regional efforts are in place for training, then information regarding the training should be provided to landlords.
- The city can work to create a registry or database listing landlords or repeat code offenders and create an enforcement remedy.
- The city can consider providing or partnering with a nonprofit that can provide information pertaining to landlord tenant act and Fair Housing.

8. Limited Public transport

Limited hours and limited coverage area discourage riders from managing multiple things in one trip like employment – residence- groceries/retail needs. The routes only cover broad zones, they leave bigger areas between those zones unserved.

Recommendations:

- Public transit shelters can be planned at 5 minute walking distance or 0.5 mile distance for healthy individuals and for people who are elderly or have special needs this distance should be much shorter.



CONCLUSIONS & RECOMMENDATIONS

IMPEDIMENTS AND RECOMMENDATIONS

- Safe conditions that enhance walkability, even surfaced sidewalks, ramps, slopes, lighting, safe and well-maintained shelter have to go hand in hand to promote ridership and walkability.